

REMARKS

Claims 50-81 are pending in the present application. By this reply, claims 1-3, 5, 6, 10, 14-20, 24-26, 28, 30-42, 44-47 and 49 have been cancelled, and claims 50-81 have been added.

I. 35 U.S.C. § 102(e) AND 103 REJECTIONS

Claims 1-3, 14-19, 24-26, 30-38, 40-42, 45-47 and 49 have been rejected under 35 U.S.C. § 102(e) as being anticipated by *Kaloi et al.* (U.S. Patent No. 5,511,000). Claim 5 has been rejected under 35 U.S.C. § 103(a) as being unpatentable over *Kaloi et al.* (U.S. Patent No. 5,511,000) in view of *Stockum et al.* (U.S. Patent No. 5,301,240). Claims 6, 10, 20, 28, 39 and 44 have been rejected under 35 U.S.C. § 103(a) as being unpatentable over *Kaloi et al.*, as applied to claims 1 and 3 above, and further in view of *Young et al.* (U.S. Patent No. 5,479,266). These rejections are respectfully traversed.

Without acquiescing to any of the Examiner's allegations made regarding the claims and rejections, Applicant has cancelled the above rejected claims and presented new claims that would simplify issues for examination purposes, thereby expediting prosecution. In view of the cancellation of the above rejected claims, these rejections are moot. Applicant, however, will address the rejections in so far as they may pertain to the presently pending claims.

Applicant's claimed invention, as defined by the presently pending claims, requires an external device (or recording device in certain claims) when

attached to the detachable storage unit, but detached from the reproducing device, cannot reproduce data from the detachable storage unit. This feature is fully disclosed in the specification, e.g., on Page 9 of the reissue specification (Col. 3 of the patent), lines 57-67. As disclosed, in Applicant's invention, the recording unit 1 needs to be attached to the reproducing unit 2 to receive a mode signal therefrom, which allows the recording unit 1 to access data from the separable storage unit 21. In other words, in Applicant's invention, if the recording unit 1 is not attached to the reproducing unit 2 even if it is attached to the separable storage unit 21, the recording unit 1 cannot reproduce or access data from the separable storage unit 21.

Among other features recited in the claims, this feature of the independent claims is neither taught nor suggested by the primary reference, *Kaloi et al.* For example, as shown in Fig. 1 of *Kaloi et al.*, SSRPD1 (recording device) when attached to the portable storage device PSD, but detached from SSRPD2 or CID (reproducing device as equated by the Examiner), can reproduce data from the portable storage device PSD, because the SSRPD1 has recording capability and is attached to the portable storage device PSD, establishing a data path between the SSRPD1 and the PSD.

On page 9, bottom 5 lines of the Office Action dated July 31, 2002, the Examiner states, by referring to *Kaloi et al.*, that "the recording unit (Fig. 1, SSRPD1), when detached at (disconnected at, "2 A a"), from the reproducing unit 2, cannot reproduce data from the separable storage unit (PSD 2A), due to

no path to read stored data from to reproduce from the PSD". This statement is clearly incorrect because the SSRPD1 can reproduce data from the PSD 2A as long as the SSRPD1 is attached to the PSD2A, even if the SSRPD1 is detached from the SSRPD2. If the PSD2A is inserted into the SSRPD1, then a data path between the PSD2A and the SSRPD1 is established, and thus, the SSRPD1 can reproduce data from the PSD2A without requiring a connection or attachment between the PSD2A and the SSRPD2.

In contrast, Applicant's claimed invention requires, *inter alia*:

the external device when attached to the detachable storage unit, but detached from the reproducing device, cannot reproduce data from the detachable storage unit

as required by independent claims 50, 56, 68 and 72; and

the recording device when attached to the detachable storage unit, but detached from the reproducing device, cannot reproduce data from the detachable storage unit

as required by independent claims 60, 61, 75 and 76.

Further, the secondary references, *Stockum et al.* and *Young et al.* do not overcome these deficiencies of *Kaloi et al.* since *Stockum et al.* is relied on for the specific structure of a separate storage unit and *Young et al.* is relied on for teaching a table of content (TOC) structure. *Stockum et al.* and/or *Young et al.* in nowhere teaches the above noted claimed features of Applicant's invention.

Therefore, even if the references are combinable, assuming *arguendo*, the combination of references as applied by the Examiner does not teach or suggest or render obvious the invention as recited in independent claims 50, 56, 60, 61, 68, 72, 75 and 76.

Accordingly, the invention as recited in independent claims 50, 56, 60, 61, 68, 72, 75 and 76 and their dependent claims (due to their dependency) is patentable over the applied reference(s), and reconsideration and withdrawal of the rejections based on these reasons is respectfully requested.

II. INTERVIEW REQUESTED

Applicant hereby officially requests an interview with the Examiner to discuss the rejections, if the Examiner believes that the present Amendment does not place the application in condition for allowance. Please contact Applicant's representative, Ms. Esther Chong, at (703) 205-8000 to schedule the interview.

CONCLUSION

For the foregoing reasons and in view of the above clarifying amendments, Applicant respectfully requests the Examiner to reconsider and withdraw all of the objections and rejections of record, and earnestly solicits an early issuance of a Notice of Allowance.

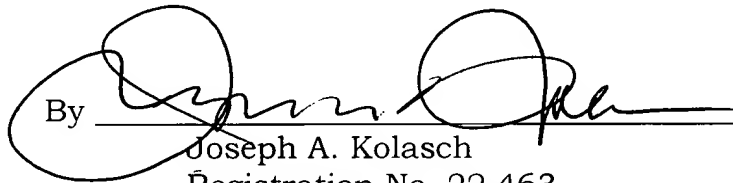
Should there be any matters which need to be resolved in the present application, the Examiner is respectfully requested to contact Esther H. Chong (Registration No. 40,953) at the telephone number of the undersigned below.

Attached hereto is a marked-up version of the changes made to the application by this Amendment.

If necessary, the Commissioner is hereby authorized in this, concurrent, and further replies, to charge payment or credit any overpayment to Deposit Account No. 02-2448 for any additional fees required under 37 C.F.R. § 1.16 or under 37 C.F.R. § 1.17; particularly, extension of time fees.

Respectfully submitted,

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Enclosures: Version with Markings to Show Changes Made

VERSION WITH MARKINGS TO SHOW CHANGES MADE

In the Claims

Claims 1-3, 5, 6, 10, 14-20, 24-26, 28, 30-42, 44-47 and 49 have been cancelled without prejudice or disclaimer of the subject matter contained therein.

New claims 50-81 have been added.